

Exhibit 10

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

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IN RE: NATIONAL PRESCRIPTION MDL No. 2804  
OPIATE LITIGATION

Case No. 17-md-2804

Judge Dan Aaron

This document relates to: Polster  
City of Cleveland v. AmerisourceBergen  
Drug Corp., et al.

Case No. 1:18-OP-45132 (N.D. Ohio)

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Videotaped deposition of
MERLE GORDON

July 19, 2018
9:15 a.m.

Taken at:
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200 Public Square, Suite 3500
Cleveland, Ohio

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1 that was an issue that we looked at
2 specifically, but I do recall that this was
3 something that was emerging, and data was just
4 anecdotally and in community meetings and we
5 were starting to hear from families and people
6 who were talking about addiction and how that
7 was impacting their families and those
8 communities.

9 Q. And that emerging data that you just
10 referenced, was that opioid-related data?

11 A. I can't say with specificity.

12 Q. How about generally; do you recall
13 any discussions of opioids impacting the City of
14 Cleveland during your tenure as a city council
15 person?

16 MR. PIFKO: Objection. Vague.
17 Overbroad.

18 A. I don't recall with specificity.

19 Q. Do you recall generally opioid
20 issues or heroine abuse or fentanyl abuse or
21 prescription drug abuse being an issue in the
22 City of Cleveland between 2007 and -- sorry,
23 1997 and 2005 as a city council person?

24 MR. PIFKO: Objection. Compound.

25 A. I recall going to a lot of meetings

1 and hearing from families and hearing from
2 neighborhoods about the impact of addiction and
3 what was happening within their own families. I
4 remember hearing stories of people's houses
5 getting broken into and people going into the
6 bathrooms and looking for drugs in medicine
7 cabinets. I remember hearing about this
8 countless times. These were painkillers. These
9 were pills people were looking for in people's
10 homes. I went to a lot of meetings and heard a
11 lot of stories of this nature.

12 Q. So you do have specific recollection
13 while you were at city council of discussions
14 related to opioid abuse and addiction?

15 MR. PIFKO: Objection to the extent
16 the question mischaracterizes her testimony.

17 MR. BOEHM: That's an outrageous
18 objection. I just have to jump in. Read the
19 deposition protocol. It doesn't permit that
20 type of objection.

21 MR. PIFKO: I don't know who you
22 are, but you can't speak, okay? You need to be
23 quiet. There's one person who speaks at a time,
24 so that's the end of it.

25 MR. BOEHM: That's not the end of